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1 Sil. 1AP# 2 H 2662

December 20, 1971

FAP #2H2662. Synergized pyrethrins in food processing and food storage areas. Comment on petitioner's letter dated 11/16/71.

Petitions Control Branch and Toxicology Branch, PTD

In our memo dated 10/6/71 we stated that, in principle, we have no objection to the FMC proposal to amend Sections 121.1074 and 121.1075 to provide for the use of combinations of piperonyl butoxide and pyrethrins in food processing and storage areas. (The regulations presently provide only for the use of these chemicals in conjunction with MGK 264.) However, we asked to see the labels and suggested that, for the record, FRD be asked to certify that the mixture is useful for the intended purpose.

Attached to the letter are six representative labels for products currently registered for use in food processing and storage ageas. The petitioner states that presumably PRD considers these two-component mixtures to be covered by the present regulations for three-component mixtures.

The concentrations of pyrethrins and piperonyl butoxide indicated by the labels are comparable to those for the three-component mixtures given in FAP #6H1946. In addition, the labels provide for the same precautions regarding the covering or removal of foods before application and the cleaning of surfaces before use. We find, therefore, that the residue data presented in FAP #6H1946 are pertinent to the use in question and conclude that residues of pyrethrins and piperonyl butoxide would not exceed the established tolerances of 1 and 10 ppm respectively.

Pharmacological considerations permitting, we recommend that the requirement be modified as proposed. We defer to PCB on whether or not PRD should be asked to certify that the mixture is useful for the intended purpose.

J. Wolff Chemistry Branch Pesticides Tolerances Division

cc: Tox. Br. FAP #2H2662 C.Smith(PRD) Chem.Br.

JWolff:jrf 12/20/71 RD/I - RSQuick, JGCummings